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Credit Management Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAHUL MANCHANDA,

Plaintiff,

v.

EDUCATIONAL CREDIT MANAGEMENT
CORPORATION,

Defendant.

CIVIL ACTION NO. 1:19-cv-05121 (WHP)

Civil Action

**NOTICE OF MOTION OF
EDUCATIONAL CREDIT
MANAGEMENT CORPORATION FOR
SUMMARY JUDGMENT PURSUANT TO
FED. R. CIV. P. 56**

TO: Rahul Manchanda, Esq.
30 Wall Street, 8th Floor
New York, NY 10005
Plaintiff *pro se*

PLEASE TAKE NOTICE that Defendant Educational Credit Management Corporation (“ECMC”), by and through its counsel, Law Offices of Kenneth L. Baum LLC, shall move before the Honorable William H. Pauley III, U.S.D.J., of the United States District Court for the Southern District of New York, at the United States District Court, 40 Foley Square, New York, New York 10007, for entry of an order granting ECMC summary judgment pursuant to Fed. R. Civ. P. 56 and for such other and further relief as the Court deems just and proper (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the undersigned will reply upon the Declarations of Kerry Klisch and Kenneth L. Baum, Esq., Statement of Material Facts, and Memorandum of Law in support of the Motion. A proposed form of order has also been submitted.

PLEASE TAKE FURTHER NOTICE that opposition, if any, to the relief sought herein shall be in writing, filed with the Clerk of the District Court, and served upon the undersigned no later than June 18, 2021.

Dated: Hackensack, New Jersey
May 25, 2021

LAW OFFICES OF KENNETH L. BAUM
LLC
Attorneys for Defendant Educational Credit
Management Corporation

By: /s/ Kenneth L. Baum
Kenneth L. Baum